	Case 4:20-cv-03664-YGR Document 68	2-1 Filed 08/11/22 Page 1 of 4		
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10	UNITED STATES DISTRICT COURT			
11	NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION			
12 13 14 15	CHASOM BROWN, WILLIAM BYATT, JEREMY DAVIS, CHRISTOPHER CASTILLO, and MONIQUE TRUJILLO, individually and on behalf of all similarly situated,	Case No. 4:20-cv-03664-YGR-SVK [PROPOSED] ORDER GRANTING MOTION TO SEAL		
16	Plaintiffs,	Judge: Hon. Susan van Keulen		
17 18 19	v. GOOGLE LLC, Defendant.			
20	Defendant.			
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		Case No. 4:20-cv-03664-VGR-SVk		

[PROPOSED] ORDER GRANTING MOTION TO SEAL

[PROPOSED] ORDER

Before the Court is Plaintiffs' Administrative Motion to Seal Plaintiffs' Supplemental Sanctions Brief Pursuant to Dkt. 624 ("Motion"). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document	Text To Be Sealed	Basis for Sealing Portion of Document
Plaintiffs' Supplemental Sanctions Brief Pursuant to Dkt. 624	GRANTED as to the portions at: Pages 1:6, 1:17-23, 2:25, 3:1-2, 3:7, 3:12, 3:16-20, 3:23, 4:6, 4:17-18, 5:13-15, 5:24, 7:2-4, 8:6-9, 8:12	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal data signals and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Declaration of Christopher Thompson In Support of Plaintiffs' Supplemental Sanctions Motion	GRANTED as to the portions at: Pages 2:26, 3:19-20, 5:5-12, 5:19-20, 5:24, 5:26	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal data signals and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in

1			this action. See Dkt. 81 at 2-3. Public disclosure of
2			such confidential and proprietary information could
3			affect Google's competitive standing as competitors may alter their systems and practices relating to
4			competing products. It may also place Google at an increased risk of cybersecurity threats, as third
5			parties may seek to use the information to compromise Google's internal practices relating to
6			competing products.
	Declaration of Mark	GRANTED as to	The information requested to be sealed contains
7	C. Mao In Support of Plaintiffs'	the portions at:	Google's highly confidential and proprietary information regarding highly sensitive features of
8	Supplemental	Pages 2:13-14,	Google's internal systems and operations, including
9	Sanctions Motion	2:17, 2:21	various types of Google's logs, that Google maintains as confidential in the ordinary course of
10			its business and is not generally known to the public
			or Google's competitors. Such confidential and
11			proprietary information reveals Google's internal strategies, system designs, and business practices
12			for operating and maintaining many of its important
13			services, and falls within the protected scope of the
			Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and
14			proprietary information could affect Google's
15			competitive standing as competitors may alter their
16			systems and practices relating to competing products. It may also place Google at an increased
			risk of cybersecurity threats, as third parties may
17			seek to use the information to compromise Google's
18	Estitia A As Mas	CD ANITED A-	internal practices relating to competing products.
19	Exhibit A to Mao Declaration –	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and proprietary
19	Plaintiffs' Proposed	the portions at.	information regarding highly sensitive features of
20	Sanctions	Pages: 1:13-15,	Google's internal systems and operations, including
21		1:21-22	various types of Google's logs, and their proprietary functionalities, that Google maintains as
22			confidential in the ordinary course of its business and is not generally known to the public or Google's
23			competitors. Such confidential and proprietary
24			information reveals Google's internal strategies, system designs, and business practices for operating
			and maintaining many of its important services, and
25			falls within the protected scope of the Protective
26			Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and
27			proprietary information could affect Google's
28			competitive standing as competitors may alter their
20			systems and practices relating to competing

1			products. It may also place Google at an increased
2			risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's
3			internal practices relating to competing products.
3	[Proposed] Order	GRANTED as to	The information requested to be sealed contains
4	Granting Plaintiffs' Supplemental	the portions at:	Google's highly confidential and proprietary information regarding highly sensitive features of
5	Sanctions Motion	Pages 3:21-26, 6:20, 6:24-7:1,	Google's internal systems and operations, including various types of Google's logs, and their proprietary
6		8:5-7, 8:20-23,	functionalities, that Google maintains as
7		9:21-24, 10:2, 10:6-7	confidential in the ordinary course of its business and is not generally known to the public or Google's
8			competitors. Such confidential and proprietary
9			information reveals Google's internal strategies, system designs, and business practices for operating
10			and maintaining many of its important services, and falls within the protected scope of the Protective
11			Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and
12			proprietary information could affect Google's
13			competitive standing as competitors may alter their systems and practices relating to competing
14			products. It may also place Google at an increased risk of cybersecurity threats, as third parties may
15			seek to use the information to compromise Google's
16			internal practices relating to competing products.
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19	DATED:		
20			HON. SUSAN VAN KEULEN
21			United States Magistrate Judge
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